1 ROBERT W. FREEMAN Nevada Bar No. 3062 Robert.Freeman@lewisbrisbois.com JENNIFER A. TAYLOR 3 Nevada Bar No. 6141 Jennifer.A.Taylor@lewisbrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 5 Las Vegas, Nevada 89118 Telephone: 702.893.3383 Facsimile: 702.893.3789 6 Attorneys for Defendant State Farm Mutual Automobile Insurance Company 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 RICARDO O. BARAHONA-GONZALEZ, an Case Number: 2:22-cv-2028-CDS-DJA 11 individual. 12 Plaintiff. STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE AN 13 VS. ANSWER TO PLAINTIFF'S **COMPLAINT** STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY: DOES 1 through 10 inclusive, and ROE ENTITIES 1-10, 15 inclusive. 16 Defendants. 17 18 COMES NOW DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE 19 COMPANY ("State Farm" or "Defendant"), by and through its counsel of record, the law firm of 20 LEWIS BRISBOIS BISGAARD & SMITH LLP, and PLAINTIFF, RICARDO O. BARAHONA-21 GONZALEZ, by and through his counsel of record, RALPH A. SCHWARTZ, P.C., hereby stipulate 22 and agree that the time for Defendant to file its Answer to Plaintiff's Complaint be extended as set 23 Defendant State Farm's Answer is currently due December 12, 2022. The parties forth herein. 24 hereby stipulate that the due date for Defendant's Answer be extended to January 4, 2023. 25 26 /// 27 /// 28 111

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1	Reason for Extension
2	The parties are active negotiations to resolve this action. In addition because of the
3	complexity and extent of the allegations and claims made in Plaintiff's Complaint, Defendant
4	requires additional time to prepare its Answer to Plaintiff's Complaint. This stipulation is made in
5	good faith and not for the purpose of delay.
6	This is the first extension of time requested for filing Defendant's response to Plaintiff's
7	Complaint.
8	DATED this 12th day of December, 2022. DATED this 12th day of December, 2022.
9	LEWIS BRISBOIS BISGAARD & SMITH RALPH A. SCHWARTZ, P.C.
10	/s/_Jennifer A. Taylor /s/ Ralph A. Schwartz
11	ROBERT W. FREEMAN RALPH A. SCHWARTZ Nevada Bar No. 3062 Nevada Bar No. 5488
12	JENNIFER A. TAYLOR, Nevada Bar No. 6141 Las Vegas, NV 89101
13	6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Las Vegas, NV 89101 Attorneys for Plaintiff Ricardo O. Barahona-Gonzalez
14	Attorneys for Defendant
15	
16	<u>ORDER</u>
17	IT IS SO ORDERED.
18	DATED this 14th day of December 2022.
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20	DANIEL J. ALBREGTS
21	UNITED STATES MAGISTRATE JUDGE
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BRISBOIS
BISGAARD
& SMITH LLP
ATTORNEYS AT LAW

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